

Department of the Army
United States Military Academy
West Point, New York 10996

West Point Supplement 1 to AR 200-3

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Environmental Quality

INSTALLATION HAZARDOUS WASTE MANAGEMENT PLAN

IMNE-MIL-PWE

FOR THE SUPERINTENDENT:

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1. **PURPOSE.** To establish responsibilities, standards and procedures for the efficient and economical removal of Hazardous Waste (HW) in an environmentally and legally acceptable manner and to ensure the management of HW complies with the West Point Environmental Management System (EMS).
 2. **APPLICABILITY.** This regulation applies to all activities, host and tenant, on West Point.
 3. **RESPONSIBILITY.** Directorate of Public Works – Environmental Management Division
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Chapter 1

Section I: General

1-1. Purpose: This regulation prescribes responsibilities, standards and procedures for the efficient and economical removal of Hazardous Waste (HW), Universal Waste, and Used Oil in an environmentally and legally acceptable manner. If you have questions concerning HW or this regulation, please contact the Directorate of Public Works (DPW), Environmental Management Division (EMD), Solid Waste Management Branch (SWMB) or Environmental Management Branch (EMB).

1-2. Applicability: This regulation is applicable to all West Point activities; all tenant commands, activities and organizations; and to all users of West Point facilities. This regulation includes the management and disposal of HW as defined in Title 6 of New York Codes Rules and Regulations part 371 (6 NYCRR 371), Universal Waste as defined in 6 NYCRR 374-3, and Used Oil as defined in 6 NYCRR 374-2.

1-3. Authority: AR 200-1 requires Army installations to comply with applicable Federal, State, and local requirements for managing HW and to establish local procedures and responsibilities for the execution of a waste management program.

1-4. References:

- a. Title 40 Code of Federal Regulations part 260-266 (40 CFR 260-266)
- b. 6 NYCRR 370-374
- c. AR 200-1, Environmental Protection and Enhancement
- d. Department of Defense (DOD) Policy to implement the EPA's Military Munitions Rule, 1 July 1998

1-5. Acronyms/Abbreviations: See Appendix A

Section II: Responsibilities

1-6. The Garrison Commander will:

- a. Ensure HW Management activities are conducted according to Federal, State, and local regulations.
- b. Determine resource requirements.
- c. Provide necessary resources to West Point activities to ensure compliance with Federal, State, and local regulations.

1-7. All Major Activity Directors, Supervisory Personnel and Tenants will:

- a. Ensure that the policies stated in this regulation are carefully observed within their activity and cooperate fully with the EMD in managing HW.
- b. Ensure that all suspected HW generated by their activity is reported in writing to the EMD for the purposes of verification and record keeping.
- c. Recycle wastes when possible and feasible.
- d. Ensure that all HW generated by their activity is accumulated in accordance with this regulation.
- e. Ensure that all HW generated by their activity is handled and removed in accordance with this regulation.
- f. Ensure that all HW handlers are fully aware and knowledgeable of these HW management requirements and have taken the required training classes.
- g. Ensure that all HW handlers meet Occupational Safety and Health Administration (OSHA) training requirements.
- h. Report any spills or leaks of HW in accordance with the Installation Spill Contingency Plan.

1-8. The Directorate of Public Works (DPW) Environmental Management Division (EMD) will:

- a. Plan, direct and coordinate HW determination, compliance of accumulation, handling and removal.

- b. Develop contract specifications for off-site disposal of HW, for inclusion in Defense Reutilization and Marketing Office (DRMO) contract and review DRMO specifications.
- c. Maintain overall surveillance of HW areas to ensure compliance with this regulation.
- d. Maintain inventory and inspection records.
- e. Consult, coordinate and report HW activities as required to Federal, New York State and Headquarters Department of the Army (HQDA) agencies.
- f. Conduct random site inspections.
- g. Maintain and operate the West Point Central 90-day accumulation site.
- h. Identify and provide HW training required by West Point personnel.
- i. Assist Directorate and other installation activities as required in complying with federal and state HW regulations.

1-9. The Commander, Medical Department Activity (MEDDAC) will ensure that all accumulation and handling of HW is in accordance with OSHA standards and all other applicable health regulations.

1-10. The Installation Safety Officer will monitor the accumulation and handling of HW to ensure compliance with current Federal and State OSHA safety standards.

1-11. The Director of Logistics (DOL) will advise HW generators on proper packaging, labeling, and shipping procedures according to the Department of Transportation (DOT) regulations.

1-12. The Office of Staff Judge Advocate will:

- a. Advocate and promote compliance with all applicable state and Federal requirements, Army policies and regulations and SOPs concerning environmental compliance matters.
- b. Provide guidance and legal opinions to EMD and other personnel on the applicability of Federal, state, and local laws and regulations governing hazardous materials, and solid waste and HW.
- c. Provide advice and guidance to Academy officials on their legal responsibilities for complying with all applicable environmental requirements.

1-13. The Director of Plans, Training , Mobility and Security (DPTMS) will ensure that any explosive ordinance disposal activity on the ranges conforms with paragraph 5-3.

1-14. The Commandant of the Corp of Cadets will ensure that all burning of excess propellant generated during training is conducted in accordance with paragraph 5-4.

1-15. Hazardous Waste Generators will:

- a. Ensure that all HW generated during operations are identified.
- b. Develop a method of tracking these wastes to minimize the potential for mixture with non-hazardous wastes, worker exposure, and spills.
- c. Identify, package, and accumulate HW in accordance with this regulation.
- d. Provide a satellite accumulation point for HW, as required.

Chapter 2

Section I: Environmental Management System (EMS) Requirements

2-1. Significance: Due to the legal requirements the management of HW is a significant environmental aspect of West Point and its management must be addressed in an Environmental Management Plan (EMP). This regulation meets the requirements of an EMP as required by the West Point EMS.

2-2. Potential Impact: Failure to comply with this EMP would impact the West Point mission. If improperly managed HW is discovered by a regulatory agency, the installation may be assessed fines that would divert funds from the mission. HW that is not managed properly can injure personnel, and cause damage to the installation and environment.

2-3. Objectives, Targets and Performance Indicators: Objectives and targets for the HW program are set by the Cross Functional Team in accordance with EMS procedures. As additional objectives are drafted, they will be addressed in this section. Due to the regulatory requirements of managing HW, the first objective of this EMP will be to manage HW in compliance with applicable Federal, State, and local regulations.

a. Objective: Manage HW in compliance with applicable Federal, State, and local regulations.

b. Targets: The targets for this objective are to receive no negative Environmental Performance Assessment System (EPAS) findings in the HW program and no violations during inspections conducted by regulatory agencies.

c. Performance Indicators: The EPAS is the Army's program for auditing environmental programs for regulatory compliance. EPAS inspections are conducted in accordance with AR 200-1 and USMA Reg 200-1 and will be used to measure the HW program's compliance with applicable regulations. The results of inspections conducted by regulatory agencies will also be monitored to measure compliance with this objective. Regulatory enforcement actions and EPAS findings are reported quarterly to the Garrison Commander at the Environmental Quality Control Committee (EQCC) meeting.

Section II: General Hazardous Waste Requirements

2-4. Characterization

- a. Hazardous wastes are defined in 6 NYCRR 371.
- b. Generators are responsible for ensuring all wastes are properly characterized prior to disposal.
- c. Generators will contact the SWMB if they have questions regarding their waste.
- d. Hazardous wastes will be turned into the SWMB or accumulated on site in compliance with Chapter 3.
- e. Generators accumulating HW will immediately notify the SWMB if the process generating the waste changes.
- f. Once notified of the change, the SWMB will reanalyze the waste to ensure it is still classified as a HW.
- g. Hazardous waste will not be mixed with non-hazardous waste. Mixing causes the entire mixture to be regulated as a HW.

2-5. Accumulation

- a. Hazardous Wastes are accumulated in Satellite Accumulation Points (SAPs) or at the 90-Day accumulation site located in MAG-9.
- b. Up to 55 gallons of each HW stream may be accumulated at or near the point of generation at a SAP.
- c. More than 55 gallons can be accumulated at the 90-day accumulation site for up to 90 days.
- d. All HW accumulation will be coordinated with the SWMB.
- e. A list of accumulation areas is attached in Appendix B. It is important to note that as new operations are initiated and old operations are discontinued this list of sites may change.
- f. In addition to the sites listed in Appendix B, any activity accumulating HW on-site on a one-time-only basis will be subject to the requirements in this regulation.

Section III: Satellite Accumulation Points (SAPs)

2-6. Site Requirements: Prior to accumulating HW, generators must coordinate with the SWMB. Each activity will designate a Point of Contact (POC) and an alternate to handle HW. Names and phone numbers of POCs will be forwarded to the SWMB. SAPs and the 90-day accumulation site will meet the following site requirements:

- a. Hazardous wastes will be located to minimize the hazard resulting from incompatible materials storage.
- b. Hazardous wastes shall be placed on spill containment pallets or in other appropriately contained areas to catch waste in case of a spill.
- c. Appropriate spill response materials will be available.
- d. Areas, if enclosed, must be provided with adequate ventilation and lighting.
- e. SAPs will be isolated from drains by containment units.
- f. Areas will keep proper fire/safety equipment. An appropriate fire extinguisher will be maintained within 75 feet of area. "No Smoking" signs and/or "No Open Flame" signs will be posted if there is a fire hazard.
- g. Areas shall make provisions for security. The area will not be readily accessible by unauthorized personnel.
 - (1) All drums or containers not located in a secure locked area or cabinet will be secured by a bung lock.
 - (2) All activities will provide access to secure HW areas to the DPW as required.
- h. SAPs must be approved by the SWMB prior to use. No SAP may accumulate more than 55 gallons of any waste stream (see 2-10 for exception). SAPs that accumulate acutely HW ("P" listed waste) will not accumulate more than one (1) quart of these wastes at any time.
- i. Signs will be posted at storage areas that have the words "Hazardous Waste" and the names and phone numbers of the POC and alternate.
- j. Appendix B lists all SAP locations as of the date of this regulation.

2-7. Container Maintenance: Containers at SAPs or the 90-day accumulation site will meet the following requirements:

- a. Only new/unused or used re-certified Department of Transportation (DOT) approved containers may be used to accumulate HW.
- b. Containers will be kept upright.
- c. Containers at outdoor sites will be covered to prevent moisture damage.
- d. Containers of HW must not be opened, handled or stored in a manner that may rupture the container or cause it to leak.
- e. Containers of waste must always be closed, except when it is necessary to add or remove waste.
- f. Containers shall be made of, or lined with, materials that are compatible with the HW to be stored.
- g. Containers holding HW must be in good condition. Any container of hazardous material or waste that exhibits signs of severe rusting, structural defects, or that begins to leak will be handled in one of the following ways:
 - (1) Transfer the material/waste to a container that is in good condition.
 - (2) Overpack the container. If you require assistance, please call the SWMB.
- h. Incompatible wastes shall be segregated by berms.
- i. Containers will not be completely filled. Space will be left to allow for expansion of the waste in changing temperatures.

2-8. Container Labels

- a. Containers used to accumulate HW must be marked with the words “Hazardous Waste” and with other words that identify the contents of the container.
- b. Hazardous waste generators will use labels supplied by the SWMB.
- c. Generators will fill out the contents section of the label. They will leave the start date blank.
- d. SWMB personnel will fill in the start date when the container is full and moved to the 90-day accumulation site.

2-9. Inspections

- a. Hazardous waste generators will inspect accumulation points weekly using the form in Appendix C.
- b. EMD will make random site checks to insure generator compliance with the inspection schedule and the requirements of this regulation.
- c. One-time-only sites will be subject to the same West Point compliance programs until their wastes have been properly removed for disposal.
- d. Completed inspection forms will be submitted to the SWMB weekly.
- e. Any deterioration or malfunction of equipment/structures which the inspections reveal will be scheduled for correction so as to ensure that no environmental or human health hazard develops.
- f. Immediate remedial action will be taken for hazards that have already occurred, such as spills, etc.
- g. All spills will be immediately reported and cleaned up in accordance with proper procedures. Further guidance on spill response can be obtained in the Installation Spill Contingency Plan.

2-10. Excess Accumulation at SAPs

- a. Up to 55 gallons of each HW stream may be accumulated at SAPs.
- b. When containers are nearly full, the accumulation point manager should contact the SWMB to arrange for pickup of the waste.
- c. Generators should plan ahead so that pickup can be arranged before the container is full (keeping in mind paragraph 2-6 h).
- d. If the SWMB is unable to pick up the waste before the container is full, waste may be accumulated in another container for up to 72 hours.
- e. In addition to the labeling requirements of paragraph 2-8, the container used to accumulate the excess waste must be labeled with the date the excess began to accumulate. This is the only time a generator at an SAP will put a date on an HW container.
- f. Once the 55 gallon limit is reached at an SAP, the waste must be moved to the 90-day accumulation site within 72 hours.

2-11. Training Requirements

- a. Hazardous waste personnel responsible for managing SAPs or the 90-day accumulation site will receive an HW briefing from EMB once a year.
- b. Newly assigned personnel will not work unsupervised until they have completed training.

Section IV: 90-Day Accumulation Site**2-12. Turn-In Inspection**

- a. When containers of waste are brought to the 90-day accumulation site, the 90-day accumulation site manager will visually inspect the container and its cover and closure devices to check for visible cracks, holes, gaps, or other open spaces into the interior.
- b. If a defect is detected, the site manager will repair the container, overpack the container, or transfer the contents to a new container.
- c. Repair, overpack, or transfer will be initiated within 24 hours of discovering the defect and completed within 5 days.
- d. Defects and the steps taken to correct them will be annotated in the facility log.

2-13. Container Date

- a. Each waste container in the 90-day accumulation site will be marked with an accumulation date.
- b. Each container will have a label as specified in paragraph 2-8.
- c. For waste received from SAPs, the date on the label will be the day the drum was moved to the 90-day accumulation site.
- d. For waste accumulated at the 90-day accumulation site, the date will be the day waste was first put into the drum.

2-14. Site Requirements

- a. Personnel entering the 90-day accumulation site will have a two-way radio or cell phone capable of summoning emergency assistance from local police and fire departments.
- b. Portable fire extinguishers, spill control equipment, and decontamination equipment will be located at the site.
- c. All communications and safety equipment will be tested and maintained as necessary to assure its proper operation in an emergency. Inspections and testing will be documented on the weekly inspection forms (see Appendix D).
- d. Aisle space will be maintained to allow the unobstructed movements of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the site in an emergency.
- e. A copy of the Installation Spill Contingency Plan will be kept available at the site. Any response to spills or emergencies will be conducted in accordance with the Installation Spill Contingency Plan.
- f. Incompatible wastes will be separated by a dike, berm, wall, or other device.

2-15. Personnel Records: The 90-day accumulation site manager will maintain the following records for personnel who work at the site:

- a. The job title for each position at the facility related to HW management and the name of the employee filling each job.
- b. A written job description for each position that includes:
 - 1) Skill, education, or other qualifications.
 - 2) Duties.
- c. The type and amount of introductory and continuing training.
- d. Records that document the training completed by the employee. Training records must be kept until closure of the facility. Training records on former employees must be kept for three years from the date the employee last worked at the facility.

Chapter 3

Procedures for Turn-in, Transportation, and Manifests: Generators will contact the SWMB to arrange for turn-in of HW. Hazardous waste manifests are not required for transportation of HW between contiguous areas of West Point, including transportation from the ranges to the 90-day accumulation site. All HW shipped from West Point for disposal will be properly manifested, labeled, and placarded in accordance with New York State and Federal regulations.

3-1. SAP Turn-in of Hazardous Waste

SAP managers will contact the SWMB and follow the procedures in this chapter to arrange for the turn-in of HW.

- a. Hazardous waste must be turned into the 90-day accumulation site immediately (within 72 hours) upon accumulation of 55 gallons.
- b. No HW shall be transported by West Point personnel or tenant command personnel unless the HW has been identified and accepted in writing by the SWMB.
- c. All HW must have the following forms completed before transportation to the 90-day accumulation site. These forms or information relating to their use can be obtained from the SWMB.

- (1) A West Point Disposal Request Form.
- (2) An MSDS sheet or waste profile sheet.
- d. Personnel operating vehicles carrying HW shall have appropriate Commercial Drivers License (CDL) and endorsements.
- e. All vehicles used to transport HW shall meet the standards required by the State of New York and the DOT.

3-2. 90-day Turn-in of Hazardous Waste

- a. The SWMB will coordinate with the Defense Reutilization and Marketing Office (DRMO) for the removal of HW from West Point to a permitted HW Treatment, Storage and Disposal Facility (TSDF). All HW must be removed from the 90-day accumulation site within 90-days of the accumulation start date.
- b. Prior to shipping HW, the SWMB will obtain written confirmation from the TSDF that they are authorized, have the capacity, and will assure the ultimate disposal is followed for the particular waste on the manifest.
- c. Prior to shipping, the SWMB will obtain written confirmation from the transporter that they are authorized to deliver the waste to the TSDF.

3-3. Hazardous Waste Manifests

- a. All HW manifests will be routed through the SWMB for signature, tracking and recordkeeping.
- b. Only trained and authorized personnel from the EMD will sign manifests.
- c. Personnel who sign manifests will be specified in writing and will successfully complete a training course in HW and DOT regulations.
- d. Personnel will inspect that the manifest is correct and ensure that the vehicle is properly loaded and placarded.

Chapter 4 Record Keeping

4-1. Manifests

- a. The SWMB will keep a copy of each complete manifest, Land Disposal Restriction (LDR), and analysis result or MSDS as required by federal and state regulations.
- b. The SWMB will submit a copy of the manifest to the New York State Department of Environmental Conservation (NYSDEC) within 5 days of shipping the waste.

4-2. Exception Reports

- a. If a copy of the manifest is not received from the TSDF within 35 days of the date of shipping, the SWMB will contact the transporter and/or the TSDF to determine the status of the shipment.
- b. If a copy of the manifest signed by TSDF facility receiving the waste is not received within 45 days of the date of shipping, the EMB will file an exception report as specified in 6 NYCRR 372.2 (c).

4-3. Annual Hazardous Waste Report: EMD shall submit completed annual report forms to NYSDEC no later than March 1 for the preceding calendar year. Copies of the report will be kept in the EMB files.

Chapter 5

Munitions/Explosives: This section covers explosive training, range clearance activities and storage of waste military munitions (WMM) under the Military Munitions Rule (MMR). West Point will manage waste munitions and explosives in accordance with the DOD Policy to Implement the EPA's Military Munitions Rule dated 1 July 1998. When applicable, West Point will store WMM in accordance with the conditional exemption (CE).

5-1. Storage of Waste Military Munitions (WMM): In the event West Point generates or acquires waste military munitions that must be managed on-site, personnel from DOL and DPW will jointly determine a storage location that meets applicable environmental, Department of Defense Explosive Safety Board (DDESB) Standards and Army implementing regulations.

a. Waivers or exemptions to DDESB standards make the unit ineligible for storage under the CE.

b. The WMM accumulation point manager will do the following:

(1) Keep written records of all WMM stored under CE. These records will contain the following information:

(a) The type of WMM accumulated by standard nomenclature, Lot Number, Federal Supply Class (FSC), National Stock Number (NSN), Department of Defense Ammunition Code (DODAC), and condition code.

(b) The quantity of each type waste military munitions stored.

(c) The date that each military munitions, by type, was identified as waste.

(d) The last storage date for each, by type, waste military munitions.

(e) The storage location or locations (e.g., building number or storage pad, and grid coordinates) used.

(f) The disposition (e.g., destroyed, demilitarized, shipped) and date of action, by type, of the waste munitions.

(g) When applicable, the sending and receiving sites for those WMM received from or shipped to off-site sources.

(2) Make available to EMD personnel or the appropriate Federal or State environmental regulatory authority these records when requested.

(3) Inventory any WMM stored under CE at least annually.

(4) Inspect any WMM stored under CE, at least quarterly, for compliance with the conditions of CE and maintain records of the inspections.

(5) Limit access to appropriately trained, specifically authorized personnel.

(6) Brief any Federal and State environmental regulatory agency personnel, who require access to determine whether WMM are stored per CE, on explosive safety concerns and cleared for access, are considered trained and authorized.

(7) Assign a person trained in the management and handling of ammunition and explosives to escort the above personnel.

c. Comply fully, without waiver or exemption, with DoD 6055.9-STD.

d. Each unit storing CE WMM or explosives must be included in a DDESB-approved explosives safety site plan that the installation or responsible activity keeps on file.

e. Those portions of the site plan-addressing units storing WMM under CE shall be made available to the appropriate Federal or State environmental regulatory authority upon request.

f. Physically separate (e.g., on a separate pallet or shelf) WMM from non-WMM when both are stored in the same storage unit or area.

g. The storage area will be marked "Hazardous Waste Munitions."

h. Storage records will comply with the DOD Implementation Policy for EPA's Military Munitions Rule, Chapter 7 Section C.2.5.

i. For non-chemical agent WMM that contain liquids (e.g., munitions or missiles that use liquid propellants), the facility used to store the WMM must have either a secondary containment system, which ensures that any released liquids are promptly detected and detained until properly removed from the area, or a vapor detection system, which ensures that any released liquids or vapors are promptly detected so that an appropriate response is

taken. (An appropriate response may include additional containment, such as repair of the container, over packing, or removal from the storage area.) For these WMM, the storage of non-leaking weapons in their shipping or storage container is considered a means of secondary containment.

j. The WMM accumulation point manager will notify the EMD as soon as possible upon learning of the theft or loss of any WMM or the failure to meet any of the storage requirements of this section that may endanger health or the environment (e.g., fire, explosion, release, discharge). EMD will notify the NYSDEC, Division of Hazardous Substances Regulation within 24 hours of the release. EMD will follow up with written notice within 5 days of the release.

5-2. Non-Military Munitions

a. Waste non-military munitions will be handled as HW.

b. When West Point ranges are used by civilian organizations, that organization will keep and be responsible for properly managing any excess munitions generated during training.

(1) Prior to using the range, the organization must sign a statement stating they will not leave any munitions at West Point.

(2) West Point personnel will not take possession of non-military munitions unless seized by the Military Police. Disposal of explosive reactive wastes is very expensive and every effort will be made to return the munitions to the owner or bill the owner for the cost of disposal.

c. If West Point personnel come into possession of non-military munitions, they will be turned into the Military Police for storage at SWMB's 90-day accumulation site.

d. If stable munitions/explosives are seized by the MP, the items become HW at the time they are no longer needed as evidence. The MP will turn the waste munitions over to the SWMB for storage at their 90-day accumulation site.

e. Storage of non-military munitions:

(1) Any HW munitions (non-military) will be stored in the 90-day accumulation site.

(2) DOL will supply a qualified storage container for munitions.

(3) DOL will supply the proper explosive placards and labels.

(4) SWMB will set a separate area aside for munitions storage in the 90-day accumulation site if and when waste munitions are required to be stored.

(5) DOL will assist and provide SWMB with munitions training computer courses in accordance with Department of Defense Explosive Safety (DDES) Standards

(6) DOL and SWMB will document the training and SWMB will retain record of the training.

5-3. DPTMS/Range Control will ensure EOD personnel comply with the requirements of this section. EOD personnel may use West Point ranges for training, explosives emergencies, and range clearance activities.

a. EOD Training:

(1) The use of military munitions in the training of military personnel is not subject to regulation under the Resource Conservation and Recovery Act (RCRA). It is the responsibility of the unit conducting the training to maintain records documenting the training in accordance with DOD policy.

(2) Copies of training records must be maintained and available to inspectors.

(3) Training records will include units trained, purpose, dates, training standards, lesson plans, and defined munitions support requirements.

(4) Prior to using the range for training, the EOD unit conducting the training will sign a statement stating the range is being used for training.

b. Explosives Emergency:

(1) EOD units responding to explosives emergencies at West Point will conduct operations in accordance with DOD policy and any Memorandums of Understanding existing between the unit and the NYSDEC.

(2) If the EOD unit determines the situation does not require an emergency response, the items will be turned over to West Point for storage and disposal as HW.

(3) An emergency is defined as an imminent threat to safety, environment, or property and is determined by an emergency response specialist.

(4) When EOD or the MP find or dispose of ordinance related items, a copy of the Incident Report will be sent to EMD.

(5) After using a range for an emergency, the emergency response specialist will sign a statement prepared by Range Control stating the range was used for an explosives emergency.

(6) West Point ranges will not be used for convenience or as a cost savings measure. Such use could result in a violation of State and Federal regulations and in closure of the range.

c. Range Clearance:

(1) Recovery, collection and on-range destruction of military munitions during range clearance activities are not waste management activities.

(2) Used or unused munitions will not be buried on the range.

(3) Used munitions that are removed from the range for storage prior to disposal are HW and will be stored and transported in accordance with this regulation.

5-4. Excess Propellant Training: During the summer, artillery training is conducted at Range 2. Included in the training is instruction in burning excess propellant. The residue from burning excess propellant is an HW and will be managed in accordance with this section.

a. Before conducting training the cadre in charge of training at Range 2 will assign two personnel who will be responsible for ensuring waste from burn activities is properly managed.

b. Before burning excess propellant these personnel will receive a briefing from the EMD.

c. The EMD will provide containers, labels, and containment pallets for storing the waste.

d. All burning will be conducted in the containment pan located at Range 2. Residue will be removed from the pan after each use and the pan will be kept covered when not in use.

e. All waste residues from burning and cleaning the containment pan will be managed IAW Chapter 3 of this regulation.

5-5. Transportation

a. New York State has not adopted the CE for transportation of WMM. All waste military munitions must be manifested as HW before transporting. A manifest is not required for transportation of waste munitions between contiguous areas of West Point.

b. Transportation of all WMM off the installation will be coordinated with the EMD SWMB in accordance with section 3-3.

Chapter 6

Universal Waste

Universal wastes are HWs that may be managed under simplified requirements. Universal wastes at West Point include batteries and fluorescent light tubes. Personnel who manage Universal Waste will comply with the following:

6-1. Fluorescent Light Bulbs

a. Fluorescent light bulbs will be collected in fiberboard drums supplied by the SWMB. Drums will be kept closed unless lamps are being added or removed.

b. Broken lamps will be immediately cleaned up and put into a sealed plastic bag before being placed in the fiberboard drum.

c. Drums will be labeled "Universal Waste Lamps" and the date accumulation began.

d. Fluorescent light bulbs will not be accumulated for more than one year.

e. When containers are full, or every 11 months, generators will contact the SWMB for removal.

6-2. Batteries: Batteries that meet the definition of hazardous waste will be managed as universal waste in accordance with this section. Universal waste batteries include but are not limited to nickel cadmium, mercury, lead, and some types of lithium batteries.

- a. Batteries will be collected in containers or on spill pallets.
- b. Batteries that show evidence of damage or leaking will be stored in closed containers.
- c. Containers and spill pallets will be compatible with the contents of the battery and capable of containing any leaks.
- d. Spills will be immediately cleaned up and placed in a closed container. Spill cleanup debris will be managed as a HW in compliance with Chapter 2 of this regulation.
- e. Containers or pallets will be labeled “Universal Waste Batteries” and the date accumulation began.
- f. Batteries will not be accumulated for more than one year.
- g. When containers are full, or every 11 months, generators will contact the SWMB for removal.

6-3. Training

- a. Employees who handle or manage Universal Waste will be trained in the requirements of this chapter. Activities will contact the EMD to receive a briefing.
- b. New employees will not work unsupervised until they have been trained.

Chapter 7

Used Oil

Used oil will be accumulated in accordance with this chapter. Used oil that is properly managed is not regulated as a HW. Used oil that is mixed with a HW must be managed in accordance with the requirements of Chapter 2. Care shall be taken to ensure used oil does not become mixed with other chemicals.

7-1. Site Requirements

- a. Used Oil generators are subject to the requirements of the Installation Spill Contingency Plan.
- b. Used Oil containers are required to have secondary containment and spill cleanup kits.

7-2. Container Maintenance: Containers and above ground tanks used to store used oil at generator facilities must be;

- a. Inspected weekly for good condition with no severe rusting, apparent structural defects or deterioration.
- b. Inspected for leakage.
- c. Damaged containers must be repaired or replaced immediately.
- d. Spills must be cleaned up immediately.

7-3. Container Labels

- a. Containers and aboveground tanks used to store used oil must be labeled or marked clearly with the words “Used Oil.”
- b. Fill pipes used to transfer used oil into underground storage tanks must be labeled or marked clearly with the words “Used Oil.”
- c. Labels can be obtained from the SWMB.

7-4. Turn-in Requirements

- a. Generators will contact the SWMB to schedule a pickup when containers are full.
- b. Used oil will be analyzed for total halogen content before it is removed from the site. Used oil containing greater than 1,000 ppm total halogens will be managed as an HW in accordance with Chapter 3 of this regulation.

Chapter 8

Spill Prevention, Control and Response

West Point activities that store or handle HW, universal waste or used oil will prepare for and respond to spills in accordance with the Installation Spill Contingency Plan and the Spill Prevention Control and Countermeasures Plan. The West Point Fire Department will immediately be notified (dial 911) in the event of a spill.

Chapter 9

Updating the Installation Hazardous Waste Management Plan

This plan will be updated as appropriate and/or as operations and regulations change. Users are requested to send comments and suggested improvements on DA Form 2028 (Recommend Changes to Publications and Blank Forms) to DPW EMD, ATTN. IMNE-MIL-PWE.

APPENDIX A

Acronyms / Abbreviations

AR	- Army Regulation
CDL	- Commercial Drivers License
CE	- Conditional Exemption
CFR	- Code of Federal Regulations
DA	- Department of the Army
DDESB	- Department of Defense Explosive Safety Board
DPW	- Directorate of Public Works
DOD	- Department of Defense
DODAC	- Department of Defense Ammunition Codes
DOL	- Directorate of Logistics
DOT	- Department of Transportation
DPTMS	- Directorate of Plans, Training, Mobility and Security
DRMO	- Defense Reutilization and Marketing Office
EMB	- Environmental Management Branch
EMD	- Environmental Management Division
EMP	- Environmental Management Plan
EMS	- Environmental Management System
EOD	- Explosive Ordnance Disposal
EPA	- Environmental Protection Agency
EPAS	- Environmental Performance Assessment System
EQCC	- Environmental Quality Control Committee
FSC	- Federal Supply Class
HQDA	- Headquarters Department of the Army
HW	- Hazardous Waste
IAW	- in accordance with
LDR	- Land Disposal Restrictions
MEDDAC	- Medical Department Activity
MP	- Military Police
MSDS	- Material Safety Data Sheet
NSN	- National Stock Number
NYCRR	- New York Codes, Rules & Regulations
NYSDEC	- New York State Department of Environmental Conservation
OSHA	- Occupational Safety and Health Administration
POC	- Point of Contact
RCRA	- Resource Conservation and Recovery Act of 1976
SAP	- Satellite Accumulation Point
SJA	- Staff Judge Advocate
SOP	- Standard Operating Procedure
SWMB	- Solid Waste Management Branch
TSDF	- Treatment, Storage, or Disposal Facility
UN	- United Nations
USMA	- United States Military Academy
WMM	- Waste Military Munitions

APPENDIX B

Hazardous Waste Accumulation Areas

90-Day Accumulation Site

Location	Office	Phone #
Mag 9	SWMB	4974

Satellite Accumulation Points

Location	Office	Waste
Bldg 601	EECS	Diffusion transfer developer
		Lithographic film fixer
		Sodium persulfate
		Potassium hydroxide
Bldg 606	Dental Clinic	Photo Fixer
	Cadet Health Clinic	Photo Fixer
	Pharmacy	Medicine
Bldg 630	Vet Clinic	Epinephrine
Bldg 753	Chemistry Lab	Off Spec Chemicals
Bldg 793	Transportation	Waste Paint
		Waste Gas/Diesel
		Waste Antifreeze Sludge
		Used Cleaner Lubricant Preservative
Bldg 845	Laundry / Dry Cleaner	Dry Cleaning Sludge
Bldg 900	Radiology	Photo Fixer
	Oral Surgery	Photo Fixer
	Emergency Room	Medicine
	Pharmacy	Medicine
Bldg 2101	DOIM	Paint thinner
		Paint/stain rags
Range 2	Range Control	Propellant Residue

**APPENDIX C
HAZARDOUS WASTE SATELLITE ACCUMULATION POINT
WEEKLY REPORT**

LOCATION:

DATE:	SIGNATURE:
PHONE #:	

Storage Containers

<i>Criteria</i>	<i>Yes</i>	<i>No</i>	<i>Comments</i>
Container in good condition (damage, corrosion, deformation) <i>6 NYCRR 373-3.9 (b)</i>			
Waste compatible with container <i>6 NYCRR 373-3.9(c)</i>			
Container closed <i>6 NYCRR 373-3.9(d)(1)</i>			
Container properly labeled <i>6 NYCRR 373-3.9(d)(3)</i>			
Less than 55 gallons per waste stream <i>6 NYCRR 372.2(a)(8)(i)('a')</i>			

Site Specifics

<i>Criteria</i>	<i>Yes</i>	<i>No</i>	<i>NA</i>	<i>Comments</i>
Secondary containment <i>6 NYCRR 373-3.3(b)</i>				
Emergency eyewash/shower <i>29 CFR 1910.151</i>				
Fire extinguisher <i>6 NYCRR 373-3.3(b)</i>				
Spill kit <i>6 NYCRR 373-3.3(b)</i>				
Warning signs posted <i>USMA Reg 200-3</i>				
Access points secure <i>USMA Reg 200-3</i>				

Additional Comments

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INSTRUCTIONS:

Submission of this form is required on a weekly basis. Place an 'X' in the appropriate column. An "X" in a shaded column indicates a violation/problem. If you indicate any violations/problems or have questions concerning this form please call the Solid Waste Management Branch at 938-4074/4974. Please send completed forms to the Solid Waste Management Branch through the mail distribution system (office symbol IMNE-MIL-PWE-H) or by fax (938-4277).

(Revised 2/05)

**APPENDIX D
HAZARDOUS WASTE 90-DAY ACCUMULATION SITE
WEEKLY REPORT**

<i>LOCATION: MAG 9</i>				
<i>DATE:</i>		<i>SIGNATURE:</i>		
Storage Containers				
<i>Criteria</i>	<i>Yes</i>	<i>No</i>	<i>Comments</i>	
Containers in good condition (damage, corrosion, deformation) <i>6 NYCRR 373-3.9 (b)</i>				
Containers compatible with wastes <i>6 NYCRR 373-3.9(c)</i>				
Containers closed <i>6 NYCRR 373-3.9(d)(1)</i>				
Containers properly labeled <i>6 NYCRR 373-3.9(d)(3)</i>				
Containers dated <i>6 NYCRR 372.2(a)(8)(ii)</i>				
Site Specifics				
<i>Criteria</i>	<i>Yes</i>	<i>No</i>	<i>NA</i>	<i>Comments</i>
Secondary containment <i>USMA Reg 200-3</i>				
Incompatible wastes separated by berms <i>6 NYCRR 373-3.9 (g)(3)</i>				
Emergency eyewash/shower <i>29 CFR 1910.151</i>				
Fire extinguisher <i>6 NYCRR 373-3.3(c)(3)</i>				
Spill kit <i>6 NYCRR 373-3.3(c)(3)</i>				
Warning signs posted <i>6 NYCRR 373-1.1 (d)(1)</i>				
Access points secure <i>USMA Reg 200-3</i>				
Additional Comments				

INSTRUCTIONS:

Submission of this form is required on a weekly basis. Place an 'X' in the appropriate column. An "X" in a shaded column indicates a violation/problem. If you indicate any violations/problems or have questions concerning this form please call the Solid Waste Management Branch at 938-4074/4974. Please send completed forms to the Solid Waste Management Branch through the mail distribution system (office symbol IMNE-MIL-PWE-H) or by fax (938-4277).

(Revised 2/05)